



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-3

March 8, 2001

Dennis Richardson, Treasurer  
Oregon Republican Party  
570 Liberty Street, SE, Suite 200  
Salem, OR 97301

Identification Number: C00153031

Reference: 12 Day Pre-General Report (10/1/00-10/18/00)

Dear Mr. Richardson:

This letter is to inform you that as of March 7, 2001 the Commission has not received your response to our request for additional information, dated February 14, 2001. This notice requests information essential to full public disclosure of your federal election campaign finances. To ensure compliance with the provisions of the Federal Election Campaign Act (the Act), please respond to this request (copy enclosed).

An adequate response must be received at the Commission by March 28, 2001. Adequate responses received on or before this date will be taken into consideration in determining whether audit action will be initiated. **Requests for extensions of time in which to respond will not be considered.** Failure to provide an adequate response by this date may result in an audit of the committee. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action.

If you should have any questions regarding this matter, please contact Alice Kang on our toll-free number (800) 424-9530 (at the prompt press 1, then press 2 to reach the Reports Analysis Division) or our local number (202) 694-1130.

Sincerely,

A handwritten signature in dark ink, appearing to read "John D. Gibson".

John D. Gibson  
Assistant Staff Director  
Reports Analysis Division

Enclosure



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

Dennis Richardson, Treasurer  
Oregon Republican Party  
570 Liberty Street, SE, Suite 200  
Salem, OR 97301

FEB 14 2001

Identification Number: C00153031

Reference: 12 Day Pre-General Report (10/1/00-10/18/00)

Dear Mr. Richardson:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Commission Regulations require that a committee disclose the identification of all individuals who contribute in excess of \$200 in a calendar year. (11 CFR §104.3(a)(4)(i)) Identification for an individual is defined as the full name, mailing address, occupation and name of employer. (11 CFR §100.12) Your report discloses contributions from individuals for which the identification is not complete.

You must provide the missing information, or if you are unable to do so, you must demonstrate that "best efforts" have been used to obtain the information. To establish "best efforts," you must provide the Commission with a detailed description of your procedures for requesting the information. Establishing "best efforts" is a three-fold process.

First, your original solicitation must include a clear and conspicuous request for the contributor information and must inform the contributor of the requirements of federal law for the reporting of such information. (11 CFR §104.7(b)(1))

Second, if the information is not provided, you must make one follow-up, stand alone effort to obtain this information, regardless of whether the contribution(s) was solicited or not. This effort must occur no later than 30

days after receipt of the contribution and may be in the form of a written request or an oral request documented in writing. (11 CFR § 104.7(b)(2))  
The request must:

- clearly ask for the missing information, without soliciting a contribution;
- inform the contributor of the requirements of federal law for the reporting of such information, and
- if the request is written, include a pre-addressed post card or return envelope.

Third, if you receive contributor information after the contribution(s) has been reported, you shall either a) file with your next regularly scheduled report, an amended memo Schedule A listing all the contributions for which additional information was received; or b) file on or before your next regularly scheduled reporting date, amendments to the report(s) originally disclosing the contribution(s). (11 CFR §104.7(b)(4))

Please provide the missing information or a detailed description of your procedures for requesting the information. For more information on demonstrating "best efforts," please refer to the Campaign Guide.

-Please clarify all expenditures made for "media" on Schedule B. If a portion or all of these expenditures were made on behalf of specifically identified federal candidates, this amount should be disclosed on Schedules B, E, or F supporting Lines 23, 24 or 25 and include the amount, name, address and office sought by each candidate. 11 CFR §§104.3(b) and 106.1

-The Detailed Summary Page, on Line 18 Column A of your report, discloses \$282,860.58 in transfers from the non-federal account for joint activity for the reporting period. However, Line 21 (a)(ii) Column A discloses \$161,789.68 as the non-federal share for joint activity for the reporting period. While the non-federal account is permitted to transfer funds to the federal account for shared activity, transfers for shared activity must be made within a 70-day time period: no more than 10 days before or 60 days after the payment to the vendor. 11 CFR §§106.5(g)(2) and 106.6(e)(2) Please clarify the nature of the transfers-in from the non-federal account.

The Commission recommends that you immediately transfer back to the non-federal account, the total excessive amount which was received by your federal account outside the 70-day time period. Although the Commission

may take further legal action concerning this prohibited activity, your prompt action will be taken into consideration.

-Schedule B supporting Line 29 of your report (pertinent portion attached) discloses a \$5,000 transfer to what appears to be your non-federal account for "re-allocation from fed to state." You are advised that 11 CFR §102.5 prohibits a non-federal account from financing activity in connection with federal elections. Please provide clarifying information regarding this transaction, including the date(s) when the original activity was conducted by the non-federal account if this was the case.

-Schedule H3 discloses a breakdown of transfers received, however, you have omitted the total amounts transferred for each transfer-in. Please amend your report to reflect the total amount transferred.

-Schedule H3 of your report discloses "KeyBank Federal Account" as the name of account for transfers received from your non-federal account for shared activity. Please verify that these transfers were in fact received from your committee's non-federal account and amend your report with clarifying information.

-Itemized disbursements must include a brief statement or description of why the disbursements were made. Please amend Schedules B and H4 of your report to clarify the following description(s): "reim collateral mat.", "collateral", "collateral material", "administration", "expenses" and "consulting". For further guidance regarding acceptable purposes of disbursements, please refer to 11 CFR §104.3(b)(3).

-On Schedule H4 supporting Line 21(a) of the Detailed Summary Page, you have not included the full name and/or mailing address for the vendor(s) listed. Please amend your report accordingly.

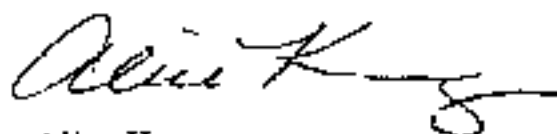
-Schedule D of your previous report disclosed a debt with an outstanding balance of \$17,542 owed to Map Applications, Inc. This obligation, however, has been omitted from this report and only \$13,875 in payments to this vendor have been disclosed on your disbursement schedules. Please amend your report to clarify this discrepancy.

-Commission records indicate the name of your political committee as the Oregon Republican Party. However, your committee files reports in the name of the Oregon Republican Party/Victory 2000. Committee filings (disclosure reports and amendments) must reflect the official name of the

committee which appears in your Statement of Organization. Please amend your report(s) to clarify this discrepancy and amend your Statement of Organization as appropriate.

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530 (at the prompt press 1, then press 2 to reach the Reports Analysis Division). My local number is (202) 694-1130.

Sincerely,

A handwritten signature in cursive script, appearing to read "Alice Kang", with a long horizontal flourish extending to the right.

Alice Kang  
Reports Analyst  
Reports Analysis Division

# SCHEDULE B

# ITEMIZED DISBURSEMENTS

Use separate schedule(s)  
for each category of the  
Detailed Summary Page

PAGE 1 OF 1  
FOR LINE NUMBER 29

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

## NAME OF COMMITTEE (In Full)

Oregon Republican Party/Victory 2000

Full Name, Mailing Address and Zip Code

Oregon Republican Party

570 Liberty SE #200

Salem, OR 97301-

Purpose of Disbursement  
Re-allocation from fed  
to state

Date (month,  
day, year)  
10/18/2000

Amount of Each  
Disbursement  
This Period  
5,000.00

Disbursement for: ☐ Primary ☒ General  
☐ Other (specify)

Full Name, Mailing Address and Zip Code

Purpose of Disbursement

Date (month,  
day, year)  
/ /

Amount of Each  
Disbursement  
This Period

Disbursement for: ☐ Primary ☐ General  
☐ Other (specify)

Full Name, Mailing Address and Zip Code

Purpose of Disbursement

Date (month,  
day, year)  
/ /

Amount of Each  
Disbursement  
This Period

Disbursement for: ☐ Primary ☐ General  
☐ Other (specify)

Full Name, Mailing Address and Zip Code

Purpose of Disbursement

Date (month,  
day, year)  
/ /

Amount of Each  
Disbursement  
This Period

Disbursement for: ☐ Primary ☐ General  
☐ Other (specify)

Full Name, Mailing Address and Zip Code

Purpose of Disbursement

Date (month,  
day, year)  
/ /

Amount of Each  
Disbursement  
This Period

Disbursement for: ☐ Primary ☐ General  
☐ Other (specify)

Full Name, Mailing Address and Zip Code

Purpose of Disbursement

Date (month,  
day, year)  
/ /

Amount of Each  
Disbursement  
This Period

Disbursement for: ☐ Primary ☐ General  
☐ Other (specify)

Full Name, Mailing Address and Zip Code

Purpose of Disbursement

Date (month,  
day, year)  
/ /

Amount of Each  
Disbursement  
This Period

Disbursement for: ☐ Primary ☐ General  
☐ Other (specify)

SUBTOTAL of Disbursements This Page (optional)

5,000.00

TOTAL This Period (last page this line number only)

5,000.00

